

REMARKS

The Office Action of July 24, 2007 has been given careful consideration by the Applicants. All claim (1-26) remain in the application. Reconsideration of the present application is hereby respectfully requested.

The Office Action

The Examiner rejected all claims pending in the application. The Examiner rejected claims 1-5, 7, 8, 11-13, 15-17, 19, 20 and 23-26 under 35 U.S.C. §102(e) as being anticipated by Wybenga (U.S. Application No. 2004/0223504). The Examiner also rejected claims 3, 6, 9, 10, 14, 18 and 22 under 35 U.S.C. §103(a). Claims 3 and 18 were rejected as being unpatentable over Wybenga in view of Sundling (U.S. Patent No. 6,785,277). The Examiner rejected claims 6, 14 and 21 as being unpatentable over Wybenga and the Examiner rejected claims 9, 10 and 22 as being unpatentable over Wybenga in view of Oner (U.S. Patent Application No. 2005/0078686). Reconsideration of the claims is hereby respectfully requested.

The Cited Art

The Examiner's primary reference is Wybenga. Wybenga is a method and apparatus for work flow based routing in a distributed architecture router. Wybenga is directed towards a router for transmitting data packets to and receiving data packets from an interfacing peripheral device. The router includes a plurality of processors that exchange data packets with each other over a common bus. This distributed architecture router provides scalability and high performance using independent nodes, including exemplary routing nodes connected by a switch. The switch comprises a pair of high speed switch fabrics. Wybenga also uses LPC drivers which, in turn, uses door bell interrupt to initiate communication between processors.

Independent claims 1 and 17 are patentably distinguishable over the cited references.

The Examiner rejected all claims as being unpatentable under either 35 U.S.C. §102 and/or 35 U.S.C. §103. Independent claims 1 and 17, in particular, were rejected under §102(e) as being anticipated by Wybenga. It is hereby submitted that the independent claims are not anticipated by the cited reference.

Claim 1 and 17 both claim an interface. Claim 1 claims an interface for

coupling the network processing devices with fabric to support communication between the nodes. Claim 17 claims at least one of a system interface and a maintenance interface for coupling for providing the cell and packet information to the network processing device. Contrary to the Examiner's statements, Wybenga does not anticipate this claimed feature.

The Examiner cites paragraph 35 and/or paragraph 41 as evidence for the rejection. However, Wybenga states in paragraph 35 that the independent routing nodes are connected by a switch which comprises a pair of high speed switch fabrics. This cannot be equated to an interface for coupling the network processing devices with fabric. One of the main purposes of the claimed disclosure is to create an architecture that alleviates the limitations of a dedicated switch (see Background, paragraphs 6 and 7 of the claimed disclosure). Therefore, this architecture should not be equated to a switch. Because an interface of claim 1 and the system interface and maintenance interface of claim 17 cannot be equated to the switch which is cited by the Examiner, the rejections to these claims should be withdrawn.

All dependent claims are patentably distinguishable over the cited references.

All dependent claims in this application are either directly or indirectly dependent from claims 1 or 17. Therefore, for at least this reason, all claims in the application, claims 1-26 are currently in condition for allowance and the rejections to these claims should be withdrawn.

Examiner also cited Sundling and Oner. However, none of these pieces of cited art cure the above stated deficiency. Neither Sundling or Oner use an interface (system or maintenance) for coupling the network process devices with fabric to support communication or provide the cell and packet information to the relevant network processing devices. Both Sundling and Oner employ a dedicated switch (Sundling uses known architecture for facilitating routing and Oner users dedicated switches 256, 232, etc.). For this reason and the reason stated above, it is respectfully requested that the rejections to all claims be withdrawn.

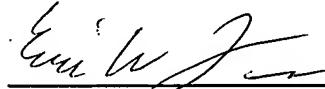
CONCLUSION

For the reasons detailed above, it is respectfully submitted all claims remaining in the application (Claims 1-26) are now in condition for allowance. The foregoing comments do not require unnecessary additional search or examination.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he/she is hereby authorized to telephone Joseph D. Dreher, at (216) 861-5582.

Respectfully submitted,

Fay Sharpe LLP



November 26, 2007

Date

Joseph D. Dreher, Reg. No. 37,123
Eric W. Lee, Reg. No. 58,857
1100 Superior Avenue
Seventh Floor
Cleveland, Ohio 44114-2579
216-861-5582

CERTIFICATE OF MAILING OR TRANSMISSION

Under 37 C.F.R. § 1.8, I certify that this Amendment is being

deposited with the United States Postal Service as First Class mail, addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date indicated below.

transmitted via facsimile in accordance with 37 C.F.R. § 1.8 on the date indicated below.

deposited with the United States Postal Service "Express Mail Post Office to Addressee" service under 37 C.F.R. 1.10, addressed to Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on the date indicated below.

Express Mail Label No.:	Signature
	
Date	Printed Name
November 26, 2007	Geóreen B. Sonntag